



237678

MEMORANDUM:

To: Shari Kolak, RPM

From: Tony Martig, Chief
Toxics Program Section

Date: September 22, 2006

RE: TSCA ARARS Review and concurrence on disposal of PCBs in Willow Blvd./A-Site OU

We have reviewed the November 2004 Focused Feasibility Study for the Willow Blvd./A-site OU cleanup which includes a risk assessment for the remedy. The remedy calls for in-situ disposal of paper waste contaminated with PCBs. The in-situ disposal of the paper waste includes re-grading and removal of PCB paper waste within the area of disposal and from one other area of contamination at the site.

The TSCA and Superfund programs believe that the most significant issue for remediation at this Operational Unit is to control erosion and for the remedy to be permanent. TSCA concurs on the Superfund program's selection of remedy "Sub-Alternative 2C." The remedy for the Willow Blvd./A-site Landfill requires re-locating the existing waste perimeter to decrease the landfill footprint, constructing a permanent berm, developing a 20 ft. floodway setback/ecological corridor between the river channel and the berm toe, and installing a permanent geo-synthetic membrane cap.

The A-Site Landfill currently contains an earthen barrier that separates the existing PCB wastes from the sheet pile wall. The barrier consists of a clean select aggregate/earthen structure. The existing sheet pile wall was designed to be at least 2 feet above the 100 year flood elevation. The remedy requires installing a permanent geo-synthetic membrane cap, which will prevent erosion of the wastes from the landfill into the river, and improving the berm where no sheet pile exists.

TSCA also understands that financial assurances, a ground water monitoring plan, and a monitoring or corrosion plan for the sheet pile wall will be negotiated during Remedial Design/Remedial Action negotiations in order to ensure the permanence of the remedy. Based on the risk assessment, financial assurance, and monitoring plans, TSCA concurs with Superfund's determination that disposal of PCB-paper/soil wastes in the A-Site Landfill will not pose an unreasonable risk of injury to health or the environment. Our concurrence is based on the Federal PCB regulations §761.61(c), *Risk-based disposal approval*, as the ARAR. Under §761.61(c), a method of disposing PCB remediation waste may be approved if EPA determines that the method does not pose an unreasonable risk of injury to health or the environment. As part of our concurrence, we considered the nature of the waste, geology, and existing monitoring data at the site and that financial assurances, a ground water monitoring plan, and a monitoring or corrosion plan for the sheet pile wall will be part of the final remedy.

It is TSCA's understanding that the wall now in place at A-Site is only a flood-protection structure. It is not in contact with remediation waste and was not designed to be an impermeable barrier. For sheet pile structures to meet the TSCA ARAR as impermeable barriers, the sheet pile structures must meet the following conditions:

- 1) all parts of the sheet pile structure are compatible with the waste and with local conditions such as soil, water, currents, waves, air, loads or vibrations that it is or may be in contact with;
- 2) a plan is developed and carried out to ensure that the wall is and remains compatible with anything it is expected to be in contact with and will not corrode or deform;
- 3) the structures are designed, constructed, inspected and tested to show it prevents water passage through joints, seams, and any construction connections with walls, caps and footings; and
- 4) monitoring shows that the wall continues to serve as an impermeable barrier and a record of that monitoring must be maintained and made available in keeping with any other CERCLA recordkeeping requirements.

The TSCA program acknowledges that the sheet pile structures at the Willow Blvd./A-site do not meet the above conditions. As noted earlier in this memo, however, our concurrence with the remedy for the site is based on §761.61(c), *Risk-based disposal approval*, as the ARAR, and considered the nature of the waste, geology, and existing monitoring data at the site and that financial assurances, a ground water monitoring plan, and a monitoring or corrosion plan for the sheet pile wall will be part of the final remedy. We request to be included in the review of the financial assurances and monitoring plans.